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November 16, 1987

Mr. Steven Lingle, Director
Hazardous Site Evaluation Division
Environmental Protection Agency
401 M Street S.W.
Washington, DC 20510

RE: Arkwood Site
Omaha, Arkansas
Site No. ARD084930148

001516

Dear Mr. Lingle:

This firm represents the past and present landowners of the above site. They have been named as PRP's in this case by the Environmental Protection Agency. I believe your file will reflect that the Ormond group is objecting to the EPA determination that this site should be nominated for promulgation to the National Priorities List. Your file should reflect that we have objected to this nomination and have previously met with Dr. Porter and filed some comments with him for inclusion in the record. My clients are firmly convinced that this site is not contaminated to the extent that it meets the requisites for inclusion on the NPL. We object to consideration of this site for nomination to the NPL and desire to present evidence to support our position. In this regard I asked Senator Bumper's office to ascertain if the comment period is still open in this matter and Ms. Debra Merrick of his office has just advised me that you will still receive comments from us on this issue.

Therefore, the Ormond group does desire to submit the following documentation to you at this time supporting our position. The first document that I am submitting herewith is a multi-page listing of the results of sampling and laboratory analysis of approximately 30 samples that were taken from wells and other sites surrounding the Arkwood site in May of 1987. The samples were taken by ERM Southwest, Inc., an engineering firm employed by another PRP herein, Mass Merchandisers, Inc., of Harrison, Arkansas. The laboratory analyses were done by ENSECO and the locations of the samples and the results are reflected in the attached document. For identification purposes I am marking this document Exhibit "A" to this letter. Exhibit "A" reflects that approximately 30 samples were taken from locations

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surrounding the Arkwood site. Your files and maps will probably already reflect the location of the sites and you may already have this information since it was filed with your Dallas office. However, I could not take the chance that this information might be missing from your files. Each sample was tested for soil contamination, groundwater contamination and air contamination. Each sample was not only tested for the presence of pentachlorophenol and cresote (the only chemicals involved in this site), but also all other suspected hazardous chemicals known to modern man. This sampling task cost approximately \$50,000.00. We believe that it is significant to the issue before you that all samples showed non-detectable levels of all chemicals except one location. The new Cricket Spring which is located downstream from the site approximately 100 yards showed 2.3 ppm pentachlorophenol. All other sites were negative. This evidence also proves that the spring itself is clearing up and will soon be below the objectionable levels of penta. We desire that this document be included in the record on the issue of site eligibility for NPL ranking.

The second document which we desire to have included in the records through our comments is marked Exhibit "B" and attached hereto. This document is a report from the engineer employed by the Ormond group to study the site and compile a ranking computation based on that firm's investigation and application of the HRS ranking formula. The engineering firm is Cranmer and Associates, Inc., of Little Rock, Arkansas. This HRS calculation report may have already been filed in your office, but I wanted to make sure that it is properly filed as a comment from my clients. As you can see from the report the CAI engineering firm has investigated the site and applied the formula to the facts and evidence found to exist and has concluded that the site merits a score well below the minimum Superfund required score.

The third document which we desire to submit to the record is a review document which we found in the Dallas file called Potential Hazardous Waste Site - Inspection Report. This document is marked Exhibit "C". It is submitted to support our position that this site is not so contaminated as to justify ranking on the NPL. The report was compiled by the Water Supply Branch of the Dallas office and forwarded to the Superfund Compliance Section. The report states that it is a follow up monitoring of ground and surface water near the inactive wood treatment facility known as Arkwood. The report states that, "Although some surface samples reveal some organics no contaminates were found in any domestic well samples. Surface contaminates do not effect any public water supply, but should certainly be addressed from a water pollution standpoint." The report recommends the installation of monitoring wells around the site to determine migration paths. The report also states that, "although not critical for present local well condition it is certainly worthwhile for possible future threats to ground-water".

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Monitoring of the site we do not oppose. Placement on the NPL we do oppose.

I am asking Ms. Merrick to hand carry this letter and attached documents to you for inclusion in the comments record on this issue of promulgation to the National Priorities List.

Very truly yours,

By: 

DOSHIER and BOWERS
ATTORNEYS FOR HALLIE C. ORMOND
and MARY F. BURKE, Landowners
(Referred to herein as the
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BFD/db

Enclosures